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Our File No.: 115695

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

Claudia Douglas, Anna Solovyova, Zakema T. Wallace,
Beatriz Mercado and Jamie Zheng, individually and on
behalf of all others similarly situated,

Plaintiffs,

vs.

Radius Global Solutions, LLC,

Defendant.

Docket No:

CLASS ACTION COMPLAINT

JURY TRIAL DEMANDED

Claudia Douglas, Anna Solovyova, Zakema T. Wallace, Beatriz Mercado and Jamie Zheng, individually and on behalf of all others similarly situated (hereinafter referred to collectively as “*Plaintiffs*”), by and through the undersigned counsel, complain, state and allege against Radius Global Solutions, LLC (hereinafter referred to as “*Defendant*”), as follows:

INTRODUCTION

1. This action seeks to recover for violations of the Fair Debt Collection Practices Act, 15 U.S.C. § 1692, *et seq.* (“FDCPA”).

JURISDICTION AND VENUE

2. This Court has federal subject matter jurisdiction pursuant to 28 U.S.C. §1331 and 15 U.S.C. § 1692k(d).

3. Venue is proper under 28 U.S.C. §1391(b) because a substantial part of the events or omissions giving rise to the claim occurred in this Judicial District.

4. At all relevant times, Defendant conducted business within the State of New York.

PARTIES

5. Plaintiff Claudia Douglas is an individual who is a citizen of the State of New York residing in Kings County, New York.

6. Plaintiff Anna Solovyova is an individual who is a citizen of the State of New York residing in Kings County, New York.

7. Plaintiff Zakema T. Wallace is an individual who is a citizen of the State of New York residing in Queens County, New York.

8. Plaintiff Beatriz Mercado is an individual who is a citizen of the State of New York residing in Kings County, New York.

9. Plaintiff Jamie Zheng is an individual who is a citizen of the State of New York residing in Queens County, New York.

10. Plaintiffs are “consumers” as defined by 15 U.S.C. § 1692a(3).

11. On information and belief, Defendant Radius Global Solutions, LLC, is a Minnesota Limited Liability Company with a principal place of business in Hennepin County, Minnesota.

12. Defendant is regularly engaged, for profit, in the collection of debts allegedly owed by consumers.

13. Defendant is a “debt collector” as defined by 15 U.S.C. § 1692a(6).

ALLEGATIONS

14. Defendant alleges each of the Plaintiffs owe a debt (“the Debts”).

15. The Debts were primarily for personal, family or household purposes and are therefore “debts” as defined by 15 U.S.C. § 1692a(5).

16. Sometime after the incurrence of the Debts, Plaintiffs fell behind on payments owed.

17. Thereafter, at an exact time known only to Defendant, the Debts were assigned or otherwise transferred to Defendant for collection.

18. In its efforts to collect the debt alleged owed by Plaintiff Douglas, Defendant contacted Plaintiff Douglas by letter dated May 14, 2018. (“**Exhibit 1**.”)

19. In its efforts to collect the debt alleged owed by Plaintiff Solovyova, Defendant contacted Plaintiff Solovyova by letter dated May 5, 2018. (“Exhibit 2.”)

20. In its efforts to collect the debt alleged owed by Plaintiff Wallace, Defendant contacted Plaintiff Wallace by letter dated April 27, 2018. (“Exhibit 3.”)

21. In its efforts to collect the debt alleged owed by Plaintiff Mercado, Defendant contacted Plaintiff Mercado by letter dated April 27, 2018. (“Exhibit 4.”)

22. In its efforts to collect the debt alleged owed by Plaintiff Zheng, Defendant contacted Plaintiff Zheng by letter dated May 5, 2018. (“Exhibit 5.”)

23. The above-referenced letters (the “Letters”) are identical for all relevant purposes herein.

24. The Letters are “communications” as defined by 15 U.S.C. § 1692a(2).

25. The Letters are all on letterhead indicating the debt collector is “Northland Group.”

26. The letter to Plaintiff Douglas states, “On 5/11/18, CAPITAL ONE BANK (USA), N.A. authorized Northland Group to collect this debt on its behalf.”

27. The letter to Plaintiff Wallace states, “The above referenced MACY’s account has been assigned to Northland Group for collection.”

28. The letter to Plaintiff Mercado states, “The above referenced MACY’s account has been assigned to Northland Group for collection.”

29. Upon information and belief, Northland Group was a Minnesota limited liability company formed on April 28, 2017.

30. Upon information and belief, Northland Group ceased to exist on April 20, 2018, when it changed its name to “Radius Global Solutions, LLC.”

31. Despite the above, Defendant sent the Letters using the name “Northland Group.”

32. 15 U.S.C. § 1692e(14) prohibits the use of any business, company, or organization name other than the true name of the debt collector’s business, company, or organization.”

33. Northland Group is not the true name of Defendant.

34. On April 20, 2018, Defendant’s true name was Radius Global Solutions, LLC.

35. On April 27, 2018, Defendant’s true name was Radius Global Solutions, LLC.

36. On May 5, 2018, Defendant’s true name was Radius Global Solutions, LLC.

- 37. On May 14, 2018, Defendant's true name was Radius Global Solutions, LLC.
- 38. Defendant failed to use their "true name" as required by 1692e(14).
- 39. Defendant used a false name.
- 40. Defendant used a name other than the true name of Defendant.
- 41. Defendant violated 1692e(14).

CLASS ALLEGATIONS

42. Plaintiffs bring this action individually and as a class action on behalf of all persons similarly situated in the State of New York from whom Defendant attempted to collect a consumer debt using the letterhead of Northland Group after April 20, 2018, to the present.

43. This action seeks a finding that Defendant's conduct violates the FDCPA, and asks that the Court award damages as authorized by 15 U.S.C. § 1692k.

44. Defendant regularly engages in debt collection.

45. The Class consists of more than 35 persons from whom Defendant attempted to collect delinquent consumer debts using the letterhead of Northland Group after April 20, 2018.

46. Plaintiffs' claims are typical of the claims of the Class. Common questions of law or fact raised by this class action complaint affect all members of the Class and predominate over any individual issues. Common relief is therefore sought on behalf of all members of the Class. This class action is superior to other available methods for the fair and efficient adjudication of this controversy.

47. The prosecution of separate actions by individual members of the Class would create a risk of inconsistent or varying adjudications with respect to the individual members of the Class, and a risk that any adjudications with respect to individual members of the Class would, as a practical matter, either be dispositive of the interests of other members of the Class not party to the adjudication, or substantially impair or impede their ability to protect their interests. Defendant has acted in a manner applicable to the Class as a whole such that declaratory relief is warranted.

48. Plaintiffs will fairly and adequately protect and represent the interests of the Class. The management of the class action proposed is not extraordinarily difficult, and the factual and legal issues raised by this class action complaint will not require extended contact with the members of the Class, because Defendant's conduct was perpetrated on all members of

the Class and will be established by common proof. Moreover, Plaintiffs have retained counsel experienced in actions brought under consumer protection laws.

JURY DEMAND

49. Plaintiffs hereby demand a trial of this action by jury.

PRAYER FOR RELIEF

WHEREFORE, Plaintiffs respectfully request judgment as follows:

- a. Certify this action as a class action; and
- b. Appoint Plaintiffs as Class Representatives of the Class, and Plaintiffs' attorneys as Class Counsel; and
- c. Find that Defendant's actions violate the FDCPA; and
- d. Grant damages against Defendant pursuant to 15 U.S.C. § 1692k; and
- e. Grant Plaintiffs' attorneys' fees pursuant to 15 U.S.C. § 1692k; and
- f. Grant Plaintiffs' costs; together with
- g. Such other relief that the Court determines is just and proper.

DATED: August 27, 2018

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